

**The District of Columbia
Workforce Investment Act
Waiver Request
Veterans Staff to Provide Universal One Stop Services**

The Department of Employment Services (DOES), which has been designated by the Mayor of the District of Columbia as the administrative entity for the Workforce Investment Act (WIA), and the District of Columbia Workforce Investment Council (DCWIC), are requesting a general waiver to permit dedicated Veterans staff identified as Local Veterans Employment Representatives (LVER) and the Disabled Veterans Outreach Program (DVOP) Specialists to provide services to both veterans and universal one-stop customers without compromising the federal mandate that all eligible veterans are given priority over non-veterans for all available services.

The granting of this waiver will support DOES in actualizing the national strategic direction of enhanced service integration, a more efficient use of WIA dollars and leveraging value adding partnerships that increase service delivery and decrease administrative staffing costs.

As a single service entity, the District of Columbia's structure for WIA consists of the Department of Employment Services (DOES), which is responsible for providing the administrative and fiscal management systems for program implementation, and the District of Columbia's Workforce Investment Council (DC WIC), which performs policy functions and represents the Mayor's economic development priorities. The planning and delivery of services are administered by the DOES Associate Director of One-Stop Career Center Operations.

This waiver request follows guidelines identified in WIA Section 189(i)(4)(B) (29 USCA Section 2939(i)(4)(B)) and WIA Final Regulations at 20 CFR Section 661.420(c).

1. Statutory Regulations to be Waived:

Title 38, United States Code (USC), Chapters 41 and 42, amended by Public Law 107-288 (Jobs for Veterans Act), 20 Code of Federal Regulations (CFR), Part 1001, Workforce Investment Act of 1998 and Wagner-Peyser Act, and the Special Grant Provisions of the Jobs for Veterans Act (JVA) Grant.

The District of Columbia is requesting that it be allowed to waive the stated federal percentage expenditure mandated for out-of-school youth.

2. State or Local Statutory Regulatory Barriers:

There are no state statutory or regulatory barriers to impede the proposed waiver and DOES policies and the DCWIC are in compliance with the current Federal guidelines. Upon notification of approval, if this waiver request is granted, DOES policy will be amended to comply with the terms of the waiver.

3. Goals to be Achieved by the Waiver:

The goal is to improve provision of services to all one stop customers through increased service delivery integration while continuing to meet veterans' priority service requirements. The waiver will allow the District to achieve full integration of one stop services by using staff more efficiently to meet the needs of the local labor market. Staffing assignments will be based on operational and customer based needs determined by the daily customer flow of the District's individual one stop career centers.

Staffing charges based on staffing allocations will be observed and structured in such a way as to reflect dedicated staffing time for servicing customers through the corresponding grant such that staff time for serving veterans will be allocated to Job for Veterans grant and staffing time for serving job seeking customers, other than veterans, will be allocated to Wegner-Peyser grant.

For programs with existing targeting provisions, such as WIA, or Wegner-Pyser, the veterans' priority will be applied by assessing a person's status in light of both the veterans' priority and the existing provision(s).

The District will continue to follow all Special Grant Provisions, Veteran Program Letters, and DOL/VETS directives, and have negotiated the Statewide LVER – DVOP roles and responsibilities as outlined in Public Law 107-288 and United States Code (USC) Title 38. LVERs roles in the One-Stop System will continue to include, providing quarterly reports to One Stop Career Centers Managers, the Veterans' Program Coordinator, and the Associate Director for One Stop Career Center Operations regarding compliance with federal law and regulations with respect to special services and priorities for Veterans and Eligible Persons.

4. Programmatic Outcomes to be Achieved by the Waiver:

- More efficient use of WIA funding
- Increased service impact and sustainability
- Enhanced service integration with workforce, education and economic development partners
- Maximizes service delivery to full range of eligible Adults including military family members
- Increased delivery of employer services to veterans

5. State Local Statutory or Regulatory Barriers:

There are no existing state or local statutory or regulatory barriers to implementation of this waiver request.

6. Individuals Impacted by the Waiver:

The waiver will positively impact all one stop customers. These customers will receive the type of services that most closely and quickly meet their individualized needs without unnecessary delay, or staffing restrictions. Service efficacy increases as available staff are used to address the needs of the customers presenting at individual one stop centers thus preparing a wider range of a customized workforce pool in line with the needs of the local labor market.

7. Process Used to Monitor Progress in Implementing the Waiver:

DOES has in place a monitoring and performance accountability system that measures and evaluates result for employers and jobseekers accessing the District's network of One-Stop Career centers. On a monthly and quarterly basis, DOES analyzes client enrollment and service levels, program expenditures, and performance outcomes. In addition, program monitors conduct onsite quarterly technical assistance reviews designed to assure that contract requirements are being met for all WIA programs and to insure that all veteran mandated requirements are met. On an annual basis, comprehensive monitoring is conducted onsite utilizing outcome reports generated from DOES's District wide database. Should this waiver request be granted, DOES will ensure regular review of the impact of waiving the restricted staffing for veteran and assess the impact of fully integrating service provisions occurring within the one stop centers.

8. Process for Notice of Local Boards and Opportunity to Comment:

DOES sought the input of DCWIC and one stop staff during the development of the waiver request. DOES administrators met to review their expenditure levels and program needs and ultimately received unanimous support for the submission of this waiver. Once the waiver document is finalized, it will be posted on the public web site maintained by DOES to allow for public comment on its content and potential impact. In addition a copy of the waiver will be available for public inspection at DOES offices, and electronic copies of the waiver will be sent via e-mail to workforce centers.